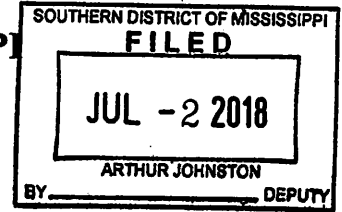


**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v. CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A/ TROUT POINT  
LODGE LTD OF NOVA SCOTIA & IN  
THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, & ASHOKA

**MEMORANDUM IN SUPPORT OF RESPONSE IN OPPOSITION TO  
DEFENDANT LEARY'S MOTION FOR LEAVE TO FILE (ECF 249)**

Plaintiff Douglas Handshoe respectfully submits this memorandum in support of his opposition to Defendant Charles Leary's Motion for Leave to File (ECF #249) and will show that Mr. Leary's Motion should be denied.

This Court previously struck Mr. Leary's prior Summary Judgment Motions since they were signed and submitted by Mr. Leary's business partner in New Orleans Louisiana.<sup>1</sup> Further, Mr. Leary failed to sign those documents and adopt them as his own after being put on notice of the deficiency. Mr. Leary's own dilatory conduct in this matter precipitated his missing the dispositive motion

---

<sup>1</sup> See Opinion and Order at ECF Number 222

deadline and the Court should not reward Mr. Leary's dilatory conduct by granting leave to file a motion the deadline of which expired over 90 days ago.

### **CONCLUSION**

The Court should deny Mr. Leary's Motion for Leave to File.

Respectfully submitted this 29<sup>th</sup> day of June, 2018,



---

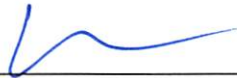
Plaintiff  
Douglas Handshoe  
Post Office Box 788  
110 Hall Street  
Wiggins, MS 39577  
(601) 928-5380  
[earning04@gmail.com](mailto:earning04@gmail.com)

### **CERTIFICATE OF SERVICE**

I, Douglas Handshoe, hereby certify that on June 29, 2018 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on June 29, 2018, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada.

Respectfully submitted this 29<sup>th</sup> day of June, 2018,



---

Douglas Handshoe  
Post Office Box 788  
110 Hall Street  
Wiggins, MS 39577  
(601) 928-5380  
[earning04@gmail.com](mailto:earning04@gmail.com)